



National Women's
Council of Ireland

Comhairle Náisiúnta
na mBan in Éirinn

National Women's Council of Ireland

Submission to

**Department of Social and Family Affairs
on the**

**Government Discussion Paper:
Proposals for Supporting Lone Parents**

June 2006

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The National Women's Council of Ireland (NWCI) is a non-governmental organisation representing women's groups in Ireland. The NWCI currently has 169 member organisations affiliated to it, representing an estimated 300,000 women.

1. Introduction

Reforming the social welfare system and ending the unequal treatment of women in the system has been a key goal of the NWCI. In our report 'A Woman's Model for Social Welfare Reform' (2003), and our subsequent campaign, the NWCI clearly highlights the discrimination that women face in the social welfare system. Over 12,000 women joined in the Brown Envelope campaign to call on the Minister for Social and Family Affairs and Minister of Finance to introduce urgent change in the system to;

- Recognise parenting and care work
- Treat women as individuals in the system
- Recognise women's employment patterns

The Government Discussion Paper clearly highlights the inequalities arising from the male breadwinner model on which the social welfare system is based. The proposals for reform however focus solely on social assistance and do not extend to the social insurance system. This anomaly will need to be addressed to end the discrimination of women in the social welfare system. The impact of a social welfare system based on a male breadwinner model has led to significant inequalities for women:

- In 2004, 23% of women were at risk of living in poverty¹.
- Women aged 65 and older have a 45% risk of living in poverty².
- Lone parents have a 42% risk of living in poverty³.
- In 2004 there were 119,159 qualified adults in total in Ireland⁴. 95% of qualified adults are women.

Women's treatment in the social welfare system affects their current choices and opportunities regarding care work and employment and their ability to move out of poverty. It also affects their future attachment to the labour market, their future access to an independent income and risk of living in poverty. The concluding comments of the Committee on the Elimination of Discrimination against Women (CEDAW), recommend that the Irish Government '*monitor the situation of poverty and social exclusion of women in the most vulnerable groups and implement effective measures and training programmes that will*

¹ Central Statistics Office (2005), Women and Men in Ireland, Dublin: Stationery Office.

² Central Statistics Office (2005) *ibid*.

³ Central Statistics Office (2005) (2), EU Survey on Income and Living Conditions, Dublin: Stationery Office.

⁴ Department of Social and Family Affairs (2005), Statistical Information on Social Welfare Services, Dublin: Department of Social and Family Affairs.

*allow them fully to enjoy the benefits of the State party's prosperity*⁵. The committee were concerned at the concentration of women in low paid and part-time work and recommended measures for the *'reconciliation of family and professional responsibilities to be adopted and implemented, including the provision of affordable childcare'*⁶. Reform is urgently needed now to address these issues, so that women's choices regarding care work or employment are recognised and facilitated.

The NWCI welcomes the objectives of the Government Discussion Paper and notes that many of the issues raised in NWCI's campaign are also highlighted in the Government Discussion Paper. During the course of the NWCI's consultations on the proposals, members have raised concerns regarding the proposed implementation process. **The challenge for the Government will be to devise legislation that acknowledges the diversity of women's lives and working patterns and simultaneously recognises both women's right to work in paid employment and to make choices regarding parenting and care.**

⁵ United Nations (2005), Committee on the Elimination of Discrimination Against Women, Concluding Comments: Ireland, United Nations.

⁶ United Nations (2005), *ibid.*

2. Parental Allowance

The NWCI welcomes the introduction of a parental allowance, which would recognise parenting as a contingency within the social welfare system irrespective of family status. The payment would also assist parents of young children living on low income in their choices regarding combining parenting and paid employment. The NWCI believes the transition period of 5 years is vital and recommends that the Government takes this as the very minimum period of transition for any reform.

Under the proposals parental choice decreases after the youngest child reaches 8 years. Moving from Parental Allowance to Unemployment Assistance clearly impacts on those parents who wish to remain caring for their children in the home. The NWCI's approach to parental choice is to continue supporting parenting in a part-time capacity until the child reaches 14 years. This would acknowledge parents' choice around caring for their children at home while facilitating them to seek work part-time.

NWCI has also proposed that if parents choose to remain at home to care for their children, the care work should be recognised and 'credited' in the social insurance system for maternity and pension purposes. This would not only value care work in the home in practice, but would also enable more people in this situation to qualify for maternity protection and a state pension in their old age. In recognising the valid concerns of many of NWCI's members regarding facilitating parental choice NWCI recommends the following:

NWCI recommends:

In addition to the Parental Allowance (0-7years)

- **Introduction of a part-time Parental Allowance for parents of children from 8 to 14 years.**
- **Change the Homemakers Scheme to**
 - **Allow for full credits**
 - **Expand the cover to maternity benefit**
- **Parental Allowance should be a permanent provision for the period of one year for newly separated and widowed persons with children under 16, and not a temporary measure as proposed. This would recognise the additional supports that families require during separation and bereavement.**

3. Qualified Adults / Individualisation

The Discussion Paper has been presented as solely focusing on lone parents. However, the proposals explicitly affect the future of current qualified adults of which there are 119,159 and who are over 95% women. To date the voices and concerns of qualified adults have not been heard sufficiently in the discussion about the proposals.

The proposals offer significant potential for independent access to payments for women who have been reliant on qualified adult payments through their husband's entitlements.

NWCI recommends:

- **Social welfare payments should no longer be a derived right. Qualified adults should have an individual payment for both social assistance and social insurance payments. This is critical for women's equality in the social welfare system.**
- **The Department should communicate the impact of the proposals on all parents in the social welfare system.**

4. Limitation Rule

In the Discussion Paper, the Government clearly outlines the arguments for abolishing the limitation rule, which are consistent with NWCI's arguments in 'A Woman's Model for Social Welfare Reform'. Removing limitation will have a positive impact on women's poverty, and women's equality in the social welfare system by enabling qualified adults to have independent access to the payment.

However, there is no rationale presented in the Discussion Paper for the reintroduction of limitation in unemployment assistance for parents when their child(ren) are above the specified age. Research highlights the fact that from household to household economies will differ and there are practical difficulties in determining the amount and whether in fact economies of scale exist⁷. Reintroducing limitation will result in significant losses for low-income families. The reduced income when moving from Parental Allowance to Unemployment Assistance will increase the level of poverty experienced by families. The financial gains made by the Government by reintroducing the limitation rule will not outweigh the considerable negatives associated with reducing a family's income particularly when the Parental Allowance ends and when costs of raising a child increase as a child gets older⁸.

NWCI recommends:

- **Limitation should be removed completely from the system. This will serve to maximise income from the Proposals in the Discussion Paper and meet equality objectives.**

⁷ NWCI (2003), A Woman's Model for Social Welfare Reform, Dublin: NWCI

⁸ Carney et al (1994), The Cost of a Child, Dublin: Combat Poverty Agency

5. Labour Market Supports

In order to reach the objectives as set out in the Discussion Paper, the following issues need to be addressed.

These relate to:

- Welfare to Work issues
- Training and Education
- Childcare
- Positive Activation and Conditionality
- Departmental Integration issues

5.1 Welfare to Work Issues

5.1.1 Poverty Traps

Elimination of poverty and unemployment traps are clear objectives of the Government and are critical in the context of creating real choice for lone parents and qualified adults. Implementation of the current proposals from Parental Allowance to Unemployment Assistance will involve scenarios where an individual will lose income. Likewise the move from welfare into work before or after the Parental Allowance ends may result in loss of secondary benefits such as rent allowance and the medical card.

The proposals put forward in the Discussion Paper have not directly outlined solutions to the issues relating to loss of income and secondary benefits upon take up of employment, or issues relating to variances in how the means test operates for various social welfare payments, all resulting in people experiencing poverty traps. In acknowledging that a review of the SWA scheme is currently taking place, it will be necessary that any recommended changes will take the Discussion Paper Proposals into account.

NWCI recommends:

- **Simplifying earnings disregards across the system.**
- **Remove poverty traps regarding loss of secondary benefits.**
- **Measures to increase child income support in low-income families such as 2nd tier child support payment.**

5.1.2 Rules for Unemployment

The NWCI welcomes the redefinition of full-time work to 19 hours and regards this as a significant step to recognise the reality of parents working and caring lives. The rules concerning loss of employment to receive unemployment payments will require adjustments to reflect the redefinition of full-time employment and women's working patterns. This will be critical to enable women to take up employment and will facilitate a greater reconciliation of work and family life.

NWCI recommends:

- **Making the means test for Unemployment Assistance consistent with the means test for OFP/Parental Allowance.**
- **Amend the rules for receiving unemployment assistance by redefining unemployment so they are consistent with the proposed genuinely seeking work criteria of 19 hours.**

5.1.3 Employment

Availability of part-time work that is secure, well paid and that provides opportunities for career progression is clearly important for women who make up 80% of all part-time employees. For lone parents, who have sole responsibility for their children, part-time work may be their preferred or only realistic option. However, the limited availability of flexible work practices to enable parents to balance work and family life has been documented in a number of recent reports, including research publications funded under the Equality for Women Measure.

NWCI recommends:

- **The Department must ensure that flexible work options, which are vital for parent's participation in the labour market, are available in all regions. This will include interdepartmental work and work with employers, particularly smaller companies to provide flexible working solutions to meet the needs of both employer and employee.**

5.2 Training and Education

Training and education is the key to accessing work that provides security and the opportunity to progress in employment. Ongoing participation in training and education is critical to achieving the aims of the proposed reforms. Locally based training, with childcare supports will be essential to maximising participation of lone parents and qualified adults.

NWCI recommends:

- **Education and training providers must be obliged to provide part-time and flexible training opportunities for parents, especially in skills training with a higher progression rate into better quality employment.**
- **Childcare supports need to be integral to any measures to engage parents in training and education.**
- **Learning and methodology from models of good practice where community based providers' work with the relevant agencies to provide needs based training, should be mainstreamed as a matter of priority.**

- **Progression routes for lone parents and qualified adults need to be identified and supported on an individual basis by the Jobs Facilitator / Local Employment Services (LES) / FAS.**

5.3 Childcare

The impact of the lack of affordable and accessible childcare on women's participation, particularly lone parents, in the labour market is clearly acknowledged and recognised in the Discussion Paper. The proposals in the Discussion Paper to have focused childcare provision is welcome, as is the availability of a fund to offset childcare costs when returning to the labour market, however the implementation of this policy is unclear. The NWCI have recommended to Government the development of a publicly subsidised childcare model 'An Accessible Model of Childcare' (2005)⁹, which weights supports in favour of low-income parents and is based on international evidence. The provision of quality affordable childcare, which meets the need of both the child and parent, is critical to enable real parental choice regarding parenting and paid employment. Currently the provision and supports are not available.

NWCI recommends:

- **The County Childcare Committees draw up clear action plans for meeting the childcare needs of parents on low incomes, in consultation with local representative organisations and childcare providers, which has the capacity to be implemented on a case-by-case basis.**
- **The National Childcare Office ensures and monitors the effectiveness of the local strategies.**
- **Allocate resources to the National Childcare Office for the development of a publicly subsidised childcare infrastructure.**
- **Allocate resources to the Job Facilitator to subsidise appropriately the financial cost of childcare places on a case-by-case basis.**

5.4 Positive Activation and Conditionality

The Department states that 'positive activation would not simply be focused on moving people into low paid jobs' (pg 99). It also refers to activation and conditionality based on a set of 'mutual obligations between the state and the client'. Given the genuine concern that mothers could be forced into badly paid and insecure employment, defining 'mutual obligations' particularly on the part of the State is critical. These obligations must set out the supports that will be in place to enable mothers to enter into quality sustainable employment.

In order to proceed with the proposals the **NWCI recommends that Government defines a model of positive activation so that:**

- **it results in real positive outcomes for both women and families.**

⁹ NWCI (2005), An Accessible Childcare Model, Dublin: NWCI.

- **it is based on clearly defined obligations, particularly on the part of the state.**

The NWCI believes that the requirement of conditionality in the Departments proposals is currently unnecessary. If the right supports and conditions for accessing the labour market along with flexible employment were available, lone parents and qualified adults will voluntarily access the supports and employment. Conditionality should only be considered when all the appropriate supports are in place. Currently substantial work and progress is required in relation to welfare to work issues, training and education and childcare (as outlined in 5.1, 5.2 and 5.3) before the Government will be in a position to fulfil its obligations. It is unjust to place obligations on lone parents and qualified adults when the Government cannot currently fulfil its side of the agreement.

The Discussion Paper names the Jobs Facilitator as the major support for lone parents and qualified adults in accessing training, education and employment. The role of the Jobs Facilitator therefore is critical to the practical application of 'positive activation' measures.

NWCI recommends:

- **A clear policy and implementation plan of Positive Activation is drawn up in consultation with groups representing women and parents reliant on social welfare that would set out the rights and responsibilities of both State and Client.**
- **No implementation of conditionality until adequate and appropriate supports are in place.**
- **The legislation governing the implementation of the proposals should define the obligations on the part of the state and include legal safe guards to protect the rights of claimants.**
- **The Jobs Facilitator role to include an outreach function in targeting lone parents and qualified adults and providing them with sufficient and specific supports according to their needs (including all flexible training/work options). This would require an adequate number of Jobs Facilitators in each area, to work on a caseload basis.**
- **Allocation of Resources to Jobs Facilitators to offset childcare and travel costs of lone parents and qualified adults.**

5.5 Departmental Integration Issues

The effective implementation of the proposals requires a significant contribution on the part of the Department of Enterprise Trade and Employment, Department of Health and Children and Department of Education. In moving the Proposals into action, a clear implementation plan needs to be drawn up in each of the Departments regarding their responsibilities in relation to all of the proposals.

NWCI recommends:

- **The Department of Enterprise, Trade and Employment, and Department of Education draw up a clear action plan to ensure education and training services will be made flexible, provided at appropriate times and provide real progression routes out of poverty for parents. These plans must translate into local implementation plans, which are relevant to the needs of parents living in the locality.**
- **A cross-departmental approach is vital to the success of these proposals should they be implemented. The NWCI is proposing a collaborative process with the Department of Social and Family Affairs and key organisations to problem solve these issues with the aim of ensuring an effective implementation plan. There must be strong political will and enforcement from the both the political system and at the highest Departmental level to ensure that various obligations of the different Departments and State Agencies are met.**

It is critical that the Department will continue to consult and actively involve the representative organisations of lone parents and qualified adults in any further discussions. Including the voices and concerns of women living in poverty and experiencing discrimination is a fundamental part of introducing any reforms within the social welfare system. The NWCI wishes to be part of any future discussion.